

AMY JOSEPH PEDERSEN, OSB No. 853958  
amy.joseph.pedersen@stoel.com  
STOEL RIVES LLP  
760 SW Ninth Avenue, Suite 300  
Portland, OR 97205  
Telephone: (503) 224-3380  
Facsimile: (503) 220-2480

DANIEL PRINCE, Cal. SB# 237112 (*pro hac vice*)  
danielprince@paulhastings.com  
FELICIA A. DAVIS, Cal. SB# 266523 (*pro hac vice*)  
feliciadavis@paulhastings.com  
LAURA E. ZABELE, Cal. SB# 330847 (*pro hac vice*)  
laurazabele@paulhastings.com  
PAUL HASTINGS LLP  
515 South Flower Street, 25th Floor  
Los Angeles, CA 90071  
Telephone: (213) 683-6000  
Facsimile: (213) 627-0705

Attorneys for Defendant NIKE, INC.

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

KELLY CAHILL, SARA JOHNSTON,  
LINDSAY ELIZABETH, and HEATHER  
HENDER, individually and on behalf of  
others similarly situated,

Plaintiffs,

v.

NIKE, INC., an Oregon Corporation,

Defendant.

Case No.: 3:18-cv-01477-JR

**DEFENDANT NIKE, INC.'S MOTION  
TO UNSEAL DEFENDANT NIKE,  
INC.'S SUR-REPLY IN OPPOSITION  
TO PLAINTIFFS' MOTION FOR CLASS  
CERTIFICATION AND THE  
SUPPLEMENTAL DECLARATION OF  
FELICIA A. DAVIS IN SUPPORT OF  
DEFENDANT NIKE, INC.'S SUR-REPLY  
IN OPPOSITION TO PLAINTIFFS'  
MOTION FOR CLASS  
CERTIFICATION**

**L.R. 7-1(a) CERTIFICATION**

In compliance with Local Rule 7-1(a), Defendant Nike, Inc. (“Nike”) certifies that it has conferred on this Motion to Unseal with Plaintiffs’ counsel regarding the substance of this Motion. Plaintiffs do not oppose the Motion.

**MOTION TO UNSEAL**

Defendant Nike, Inc. (“Nike”) hereby submits this Motion to Unseal. On June 10, 2022, Nike filed its Sur-Reply in Opposition to Plaintiff’s Motion for Class Certification (“Sur-Reply”) and the Supplemental Declaration of Felicia A. Davis in Support of Defendant Nike, Inc.’s Sur-Reply in Opposition to Plaintiff’s Motion for Class Certification (“Supplemental Declaration”), under seal out of an abundance of caution. *See* ECF Nos. 257 and 258. After reviewing the Sur-Reply and Supplemental Declaration, Nike has determined that they do not need to remain under seal. As such, Nike respectfully requests that the Court unseal Nike’s Sur-Reply and Supplemental Declaration.

Dated: June 24, 2022

Respectfully submitted,

/s/ Daniel Prince

---

Daniel Prince, Cal. SB# 237112 (*pro hac vice*)  
danielprince@paulhastings.com  
Felicia A. Davis, Cal. SB# 266523 (*pro hac vice*)  
feliciadavis@paulhastings.com  
Laura E. Zabele, Cal. SB# 330847 (*pro hac vice*)  
laurazabele@paulhastings.com

PAUL HASTINGS LLP  
515 South Flower Street, 25th Floor  
Los Angeles, CA 90071-2228  
Telephone: (213) 683-6000  
Facsimile: (213) 627-0705

Amy Joseph Pedersen, OSB No. 853958  
amy.joseph.pedersen@stoel.com  
STOEL RIVES LLP  
760 SW Ninth Avenue, Suite 3000  
Portland, OR 97205  
Telephone: (503) 294-9408  
Facsimile: (503) 220-2480

Attorneys for Defendant NIKE, INC.